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January 4, 2022

Via ECF Hon. James L. Garrity, Jr. **US Bankruptcy Court** One Bowling Green New York, NY 10004-1408

> Re: Genever Holdings LLC - Case No. 20-12411-JLG

Dear Judge Garrity:

Pursuant to Minute Order dated November 16, 2021, please accept this status letter in advance of the conference scheduled for January 11, 2022.

Insofar as the Plan is concerned, the Debtor has prepared and circulated a proposed Plan for review by Bravo Luck, PAX and Melanie L. Cyganowski, Esq., as the Sales Officer. Comments have been received from Ms. Cyganowski and Francis Lawall, Esq. on behalf of Bravo Luck. Douglas Spelfogel, Esq. is still reviewing the document on behalf of PAX, and we expect to receive his comments as well. The goal remains to file the Plan and Disclosure Statement by January 7, 2022, which is the end of exclusivity under the Court's November 18, 2021 Order.

Insofar as the sale process is concerned, the Debtor has moved for the appointment of Serene Boardman of Sotheby's as the designated real estate broker selected by the Sales Officer. I understand that Chambers is reviewing the proposed order. Sotheby's has visited the premises and initiated the preliminary work to get the premises ready for a comprehensive marketing campaign.

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We will update the Court further next week at the conference.

Respectfully yours,

/s/ Kevin J. Nash

cc: Richard Morrissey, Esq.
Douglas Spelfogel, Esq.
Francis Lawall, Esq.
Melanie Cyganowski, Esq.